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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Implementation of the Pay)	CC Docket No. 96-128
Telephone Reclassification and)	
Compensation Provisions of the)	CC Docket No. 91-35
Telecommunications Act of 1996)	
)	

AT&T'S COMMENTS ON PACIFIC BELL'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN

Pursuant to the Commission's Public Notice released January 13, 1997,¹ AT&T Corp. ("AT&T") hereby submits these comments on the Pacific Bell and Nevada Bell ("Pacific Bell's") comparably efficient interconnection ("CEI") plan for payphone service providers.²

In its CEI plan, Pacific Bell states generally that it will purchase and use the same tariffed services that are available to other providers of payphone services. Pacific Bell further states that it will satisfy the Commission's additional

¹ Pleading Cycle Established for Comments on Comparably Efficient Interconnection Plans for Payphone Service Providers, Public Notice, CC Docket No. 96-128, DA 97-72, released January 13, 1997.

² The Commission required the Bell Operating Companies ("BOCs") to file CEI plans in Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, FCC 96-388, released September 20, 1996 ("Payphone Order"); and Order on Reconsideration, FCC 96-349, released November 8, 1996 ("Reconsideration Order").

requirement that the BOCs meet the nonstructural safeguards standards adopted for their enhanced service offerings in Computer Inquiry III.³ In these comments, AT&T seeks clarification of certain aspects of Pacific Bell's service that are not specifically addressed in the CEI plan.

First, Pacific Bell's CEI plan fails to address adequately the Commission's requirement that LECs ensure transmission of codes that enable interexchange carriers to track payphone calls.⁴ Pursuant to the Reconsideration Order (para. 94), Pacific Bell is required to offer services "that provide a discrete code to identify payphones that are maintained by non-LEC providers." Accordingly, Pacific Bell should provide, in its CEI plan, detail on the types of codes it will use to identify Pacific Bell payphones and the payphones of non-affiliated providers. Whatever codes Pacific Bell chooses to use, those codes should be transmitted for both COPT Coin Line service and COPT Service (Basic) service, in order to prevent discrimination between users of the different services.⁵

³ See Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer Inquiry III), Report and Order, 104 F.C.C.2d 958 (1986).

⁴ Pacific Bell's decision (at 4 n.6) to tariff changes to COPT Coin Line to identify only those calls as originating specifically from a coin control payphone is insufficient as it would not apply to all payphones.

⁵ The Southwestern Bell Telephone Company ("SWBT") has addressed this issue in its CEI plan by stating that "[a]s required by

(footnote continued on following page)

Pacific Bell's CEI plan also does not address Pacific Bell's proposed treatment of uncollectibles due to fraud. To the extent that Pacific Bell establishes a policy of foregoing uncollectibles due to fraud for its payphone service affiliates, the same treatment must be accorded to non-affiliates, regardless of whether such practice appears in Pacific Bell's tariffs. In order to ensure such nondiscriminatory treatment, Pacific Bell should be required to modify its CEI plan to address this issue directly.

Finally, Pacific Bell's CEI plan does not address how Pacific Bell will ensure that the primary interexchange carrier ("PIC") selection process for payphones will be performed in a non-discriminatory manner. As Pacific Bell becomes both a provider of interexchange services and the administrator of the PIC selection process, it is imperative that its CEI plan describe adequate and appropriate safeguards to ensure fairness in that process.

(footnote continued from previous page)

paragraph 64 of the Reconsideration Order, at the time per-call compensation becomes effective, [SWBT's Customer Owned Pay Telephone Service] lines will transmit coding digits which will specifically identify them as payphone lines." See SWBT CEI plan, Exhibit B, page 1 of 4, filed December 30, 1996. Pacific Bell similarly should explicitly state its intention to provide the required screening information.

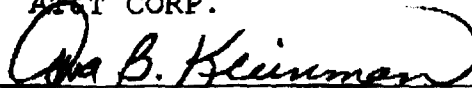
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For the reasons stated above, before Pacific Bell's CEI plan is approved, Pacific Bell should clarify its plan consistent with AT&T's comments.

Respectfully submitted,

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February 12, 1997

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 12th day of February, 1997, a copy of the foregoing "AT&T's Comments on Pacific Bell's Comparably Efficient Interconnection Plan" was mailed by U.S. first class mail, postage prepaid, to the parties listed below.

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